

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

SRI INTERNATIONAL, INC., a California  
Corporation,

Plaintiff and  
Counterclaim-Defendant,

v.

INTERNET SECURITY SYSTEMS, INC.,  
a Delaware corporation, INTERNET  
SECURITY SYSTEMS, INC., a Georgia  
corporation, and SYMANTEC  
CORPORATION, a Delaware corporation,

Defendants and  
Counterclaim-Plaintiffs.

C. A. No. 04-1199 (SLR)

**PUBLIC VERSION**

**DECLARATION OF KYLE WAGNER COMPTON IN SUPPORT OF  
SRI INTERNATIONAL, INC.'S CLAIM CONSTRUCTION BRIEF**

I, Kyle Wagner Compton, declare as follows:

1. I am an Associate with Fish & Richardson P.C., counsel for Plaintiff SRI International, Inc. ("SRI"). I make the following statements based on personal knowledge, except where noted.

2. Attached hereto as Exhibit A is a true and correct copy of U.S. Patent No. 6,321,338.

3. Attached hereto as Exhibit B is a true and correct copy of U.S. Patent No. 6,484,203.

4. Attached hereto as Exhibit C is a true and correct copy of U.S. Patent No. 6,711,615.

5. Attached hereto as Exhibit D is a true and correct copy of U.S. Patent No. 6,708,212.

6. Attached hereto as Exhibit E is a true and correct copy of the Opening Expert Report of Dr. George Kesidis on Infringement by ISS.

7. Attached hereto as Exhibit F is a true and correct copy of Opening Expert Report of Dr. George Kesidis on Infringement by Symantec.

8. Attached hereto as Exhibit G is a true and correct copy of the Expert Report of Stephen E. Smaha.

9. Attached hereto as Exhibit H is an excerpt from the rough deposition transcript of Stephen E. Smaha dated May 24, 2006.

10. Attached hereto as Exhibit I is an excerpt from THE AMERICAN HERITAGE DICTIONARY OF THE ENGLISH LANGUAGE 125, 937 (3<sup>rd</sup> ed. 1992).

11. Attached hereto as Exhibit J is a true and correct copy of the Rebuttal Expert Report of Stephen E. Smaha.

12. Attached hereto as Exhibit K are excerpts from the deposition transcripts of George Kesidis dated May 25, May 26, and May 29, 2006.

13. Attached hereto as Exhibit L is an excerpt from the rough deposition transcript of Todd Heberlein dated June 6, 2006.

14. Attached hereto as Exhibit M is a true and correct copy of an excerpt from PRACTICAL UNIT AND INTERNET SECURITY, 2<sup>nd</sup> Ed. (SYM\_P\_0498070-0498071, 0498228).

15. Attached hereto as Exhibit N is an excerpt from the deposition of Frederick Avolio dated May 18, 2006.

16. Attached hereto as Exhibit O is a true and correct copy of the Expert Report of Dr. Jeffery Hansen Regarding Non-Infringement.

17. Attached hereto as Exhibit P is an excerpt from WEBSTER'S NINTH NEW COLLEGIATE DICTIONARY 628 (1991).

18. Attached hereto as Exhibit Q is an excerpt from the DICTIONARY OF COMPUTER TERMS 628 (1996).

19. Attached hereto as Exhibit R is an excerpt from THE IEEE STANDARD DICTIONARY OF ELECTRICAL AND ELECTRONICS TERMS 304-304 (6<sup>th</sup> ed. 1996).

20. Attached hereto as Exhibit S is an excerpt from MICROSOFT PRESS COMPUTER USER'S DICTIONARY 18-19 (1990).

21. Attached hereto as Exhibit T is an excerpt from RANDOM HOUSE WEBSTER'S UNABRIDGED DICTIONARY 140, 990 (2<sup>nd</sup> ed. 1998).

22. Attached hereto as Exhibit U is an excerpt from the rough deposition of Jeffrey Hansen dated June 7, 2006.

23. Attached hereto as Exhibit V is an excerpt from the rough deposition of Stuart Staniford taken June 6, 2006.

I declare under penalty of perjury that the foregoing is true and accurate.

Executed this 9<sup>th</sup> day of June, 2006, in Wilmington, Delaware.

  
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Kyle Wagner Compton

**CERTIFICATE OF SERVICE**

I hereby certify that on June 23, 2006, I electronically filed the **PUBLIC VERSION** of the **DECLARATION OF KYLE WAGNER COMPTON IN SUPPORT OF SRI INTERNATIONAL, INC.'S CLAIM CONSTRUCTION BRIEF** with the Clerk of Court the attached document using CM/ECF which will send electronic notification of such filing(s) to the following Delaware counsel.

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/s/ John F. Horvath  
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